



RCRA COMPLIANCE AND ENFORCEMENT BRANCH
ENFORCEMENT CASE RECOMMENDATION

EPA ID NUMBER: 8000570

FACILITY NAME: Naval Station Anacostia
HMX-1 Helicopter Squadron (Bldg A398)

CASE REVIEW OFFICER: Jan Szaro

DATE: 10-01-07

FINDINGS OF INITIAL CASE REVIEW: Facility was inspected on May 17, 2007. One UST was observed that contained diesel fuel solely for an emergency generator. All aspects of this UST system appeared to be in compliance at the time of inspection. One UST was observed that contained JP-8 jet fuel contaminated with water. Functional ATG was observed but records were spotty. Functional interstitial monitoring was also observed but the individual sensors were not well identified. Facility supplied the specific information identifying each sensor location. No violations noted.

DISPOSITION RECOMMENDATION: **CLOSE**

JUSTIFICATION FOR RECOMMENDATION: No Violations

CONCURRENCE SECTION

CASE REVIEW OFFICER

Jan Szaro

DATE: 10/1/07

TEAM LEADER

[Signature]

DATE: 10/2/07

BRANCH CHIEF

[Signature]

DATE: 10/4/07

RCRA Subtitle I Inspection Report

UST Compliance Inspection

**Naval Station Anacostia
HMX-1 Helicopter Squadron, Building A398
Washington, DC 20374**

Date of Inspection:
May 17, 2007

Facility Identification Number: 8-000570

EPA Representatives:

Jan Szaro, Environmental Engineer
U.S. Environmental Protection Agency
(215) 814-3421

Martin Matlin, Environmental Scientist
U.S. Environmental Protection Agency
(215) 814-5789

State Representative:

Million Demisse
DC Department of Health
(202) 535-2525

Tank Owner:

Naval District Washington
1014 N Street, SE Suite 320
Washington Navy Yard, DC 20374-5001

Tank Owner Representatives:

John R. Ness, Environmental Engineer
(301) 227-0141

M/SGT Buczynski

S/SGT Slocum

Sam Dye, UNICCO Facility Contractor

Inspector Signature:

Jan P. Szaro

Date:

7/26/07

Background

On May 17, 2007 the United States Environmental Protection Agency, Region III (EPA) conducted a Compliance Evaluation Inspection (CEI) of the HMX-1 Helicopter Squadron facility, Building A398, located at the Naval Station Anacostia in Washington, DC, to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA). USEPA Inspector Jan Szaro was assigned to conduct this inspection and was accompanied by USEPA Inspector Martin Matlin. Million Demisse of the District Department of the Environment (DDOE) accompanied the USEPA Inspectors on this CEI.

Inspection Observations

Naval District Washington (NDW) is listed as the owner of the USTs on the notification form provided by DDOE. This inspector contacted Sharon Hamilton of DDOE on May 10, 2007 to coordinate inspection of the facility. The tank owner's representative, Mr. John R. Ness, was contacted by this inspector on May 14, 2007 to also coordinate this inspection. The inspection was conducted on May 17, 2007. The facility was open and operating during the time of inspection.

This facility is operated as the base of operations for HMX-1 Helicopter Squadron, primary responsibility of which is to provide support function to the White House. Two (2) underground storage tanks (UST) for the storage of JP-8 jet fuel are present at the fuel farm at the facility. A 3rd UST is also present at the fuel farm for the collection of JP-8 with water contamination that is pumped from the bottoms of the two (2) JP-8 USTs. At a separate location at the facility there is one (1) UST for the storage of diesel fuel for an emergency generator. See Table 1.

Table 1
USTs located at Naval Station Anacostia #8-000570
HMX-1 Helicopter Squadron, Building A398
Washington, DC 20374

Tank No.	Material	Capacity (Gal)
1	JP-8 Jet Fuel	15,000
2	JP-8 Jet Fuel	15,000
3	JP-8 Jet Fuel w/water	1,000
6	Diesel	8,000

This inspector presented credentials to Mr. Ness on arrival at the facility and explained the purpose of the inspection. This inspector had already spoken with Mr. Ness on May 14, 2007 and had informed him at that time that this facility would be inspected. Mr. Ness had prearranged for the inspectors to be granted access to this Facility due to the heightened security level maintained there. Mr. Ness verified that the facility was owned and operated by Naval District Washington.

The two (2) JP-8 Jet Fuel USTs were not closely inspected since, as part of an airport hydrant fuel distribution system, they appeared to be deferred from regulation. Each sump and tank portal of Tk-3 and Tk-6 was opened for observation. Photographic documentation of observations was restricted due to the high level of security at the Facility. For the jet fuel farm USTs, inspectors observed spill buckets, ATG monitoring ports, and possible interstitial monitoring ports for each of the USTs. For Tk-3, the JP-8 contaminated with water tank, there is a sump pump which is used only when the contents of the UST are periodically shipped off-site via U.S. Filter, a used oil handler.

For the Diesel UST, inspectors observed a spill bucket, ATG monitoring port and double wall fiberglass piping designed for suction operation.

Release Detection

An Incon T1P/4 Tank Sentinel Automatic Tank Gauging System (ATG) is used at the fuel farm area of the facility and monitors all three (3) USTs in the fuel farm. The System Setup report pulled from the Tank Sentinel during the CEI (See Attachment 2) indicated that testing is being performed on all three (3) of the USTs in the fuel farm. Two (2) of the USTs had a passing 0.2 gal/hr leak test run the day prior to the inspection. TK-1 had the test disrupted as it was put into dispense mode during the testing period.

Mr. Ness informed this inspector that the ATG system at this Facility had been expanded in 2006 to include Tk-3. He stated that this was done in response to a prior CEI conducted at the Facility in 2002. Other than the passing results for May 2007, only one (1) other documented passing result was available for the previous 12 months. The Facility representatives stated that they were unaware of any requirement to retain tank release detection records. The System Setup report for the fuel farm lists ten (10) sensors present in the fuel farm. All ten were reported by the ATG printout to be functioning normally the day of the CEI but the report did not list the type, function or location of any of the specific sensors.

The Diesel UST, though used solely to supply an emergency generator, is monitored for tank release detection by a separate Incon Tank Sentinel ATG.

Spill & Overfill

Spill buckets were observed for each of the three (3) USTs in the fuel farm and for the diesel UST. The fuel farm USTs have continuous monitoring for overfill through the ATG while the diesel UST was observed to have a flapper valve in the fill pipe.

Corrosion Protection

Observations made at the time of inspection appeared to indicate that there were not any parts of any of the UST systems at this facility that would require corrosion protection.

Financial Assurance

This is a Federal Facility.

Attachments

1. Leak Detection Inspection Checklist
2. May 17, 2007 ATG printouts

ATTACHMENT 1

Leak Detection Inspection

I. Ownership of Tank(s)

Naval District Washington
1014 N Street, SE Suite 320
Washington Navy Yard, DC 20374-5001

II. Location of Tank(s)

Naval Station Anacostia
HMX-1 Helicopter Squadron, Building A398
2701 South Capitol St, SE
Washington, DC 20374

Number of Tanks at This Location: 4

III. Tank Information

Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

Tank presently in use (circle)	Tank 1 YES	Tank 2 YES	Tank 3 YES	Tank 6 YES
If not, date last used				
If emptied, verify 1" or less of product in tank				
Month and Year Tank Installed	1/90	1/90	1/90	1/90
Material of Construction tank/pipe	DWF/DWSS	DWF/DWSS	DWF/DWSS	DWF/DWF
Capacity of Tank (in gallons)	15,000	15,000	1,000	8,000
Substance Stored	JP-8 Jet Fuel	JP-8 Jet Fuel	Waste JP-8 Jet Fuel & Water	Diesel

IV.A. Release Detection For Tanks

Check the release detection method(s) used for each tank or N/A if none required.

Manual Tank Gauging (tanks under 1,000 gal.)				
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)				
Tank Tightness Testing and Inventory Control				
Automatic Tank Gauging			X	X
Vapor, Groundwater or Interstitial Monitoring			IM	
Other approved method (SIR)				

IV.B. Release Detection For Piping

Check the release detection method(s) used for piping.

Check Pressurized (P) or Suction (S) Piping for each tank			Sump pump only used to transfer tk contents to truck	S
Automatic Line Leak Detectors, <u>and</u> check one				
Vapor or Groundwater Monitoring				
Secondary Containment with Monitoring				
Line Tightness Testing				

Comments: Tks 1&2 are deferred as they are part of an airport hydrant fuel distribution system, Tk 4 is an Emergency Generator Tk

I Jan Szaro certify that I have inspected the above named facility on 5/17/07
(print name) month/day/year

Inspector's Signature:

Jan Szaro

Date:

7/25/07

Leak Detection for Piping

Pressurized Piping

A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.

Set 1	Tank 1	Tank 2	Tank 3	Tank 6
Automatic Flow Restrictor				
Automatic Shut-off Device				
Continuous Alarm System				
and				
Set 2				
Annual Line Tightness Testing				
Interstitial Monitoring				
If Interstitial Monitoring, documentation of monthly monitoring is available				
Ground-Water or Vapor Monitoring				
If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available				
Other Approved Method (specify in comments section)				

Suction Piping

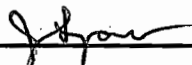
Indicate date of most recent test.

Line Tightness Testing (required every 3 years)				
Secondary Containment with Interstitial Monitoring				
Ground-Water or Vapor Monitoring				
Other Approved Method (specify in comments section)				
No Leak Detection Required (must answer yes to all of the following questions)				
Operates at less than atmospheric pressure				X
Has only one check valve, which is located directly under pump				X
Slope of piping allows product to drain back into tank when suction released				X
All above information on suction piping is verifiable				X

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

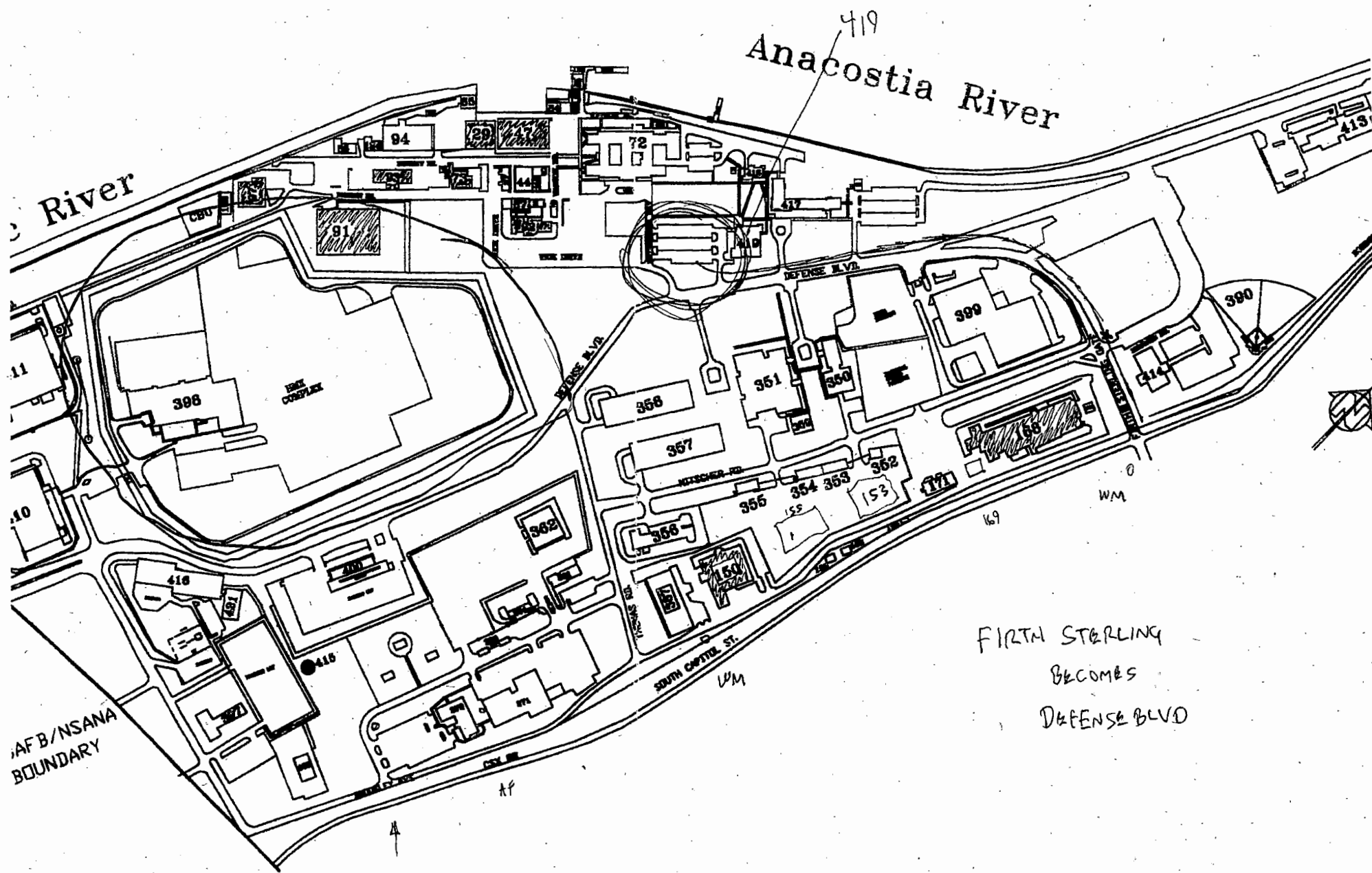
Comments: The contents of Tk 3 (the waste JP-8 w/water in the fuel) are a waste stream. Contents are periodically pumped to a truck which also picks up waste oil at the facility. This was stated to be the only time the piping from Tk 3 is used. There are sump pumps on Tks 1&2 that automatically will transfer the water content to Tk 3.

Inspector's Signature:



Date:

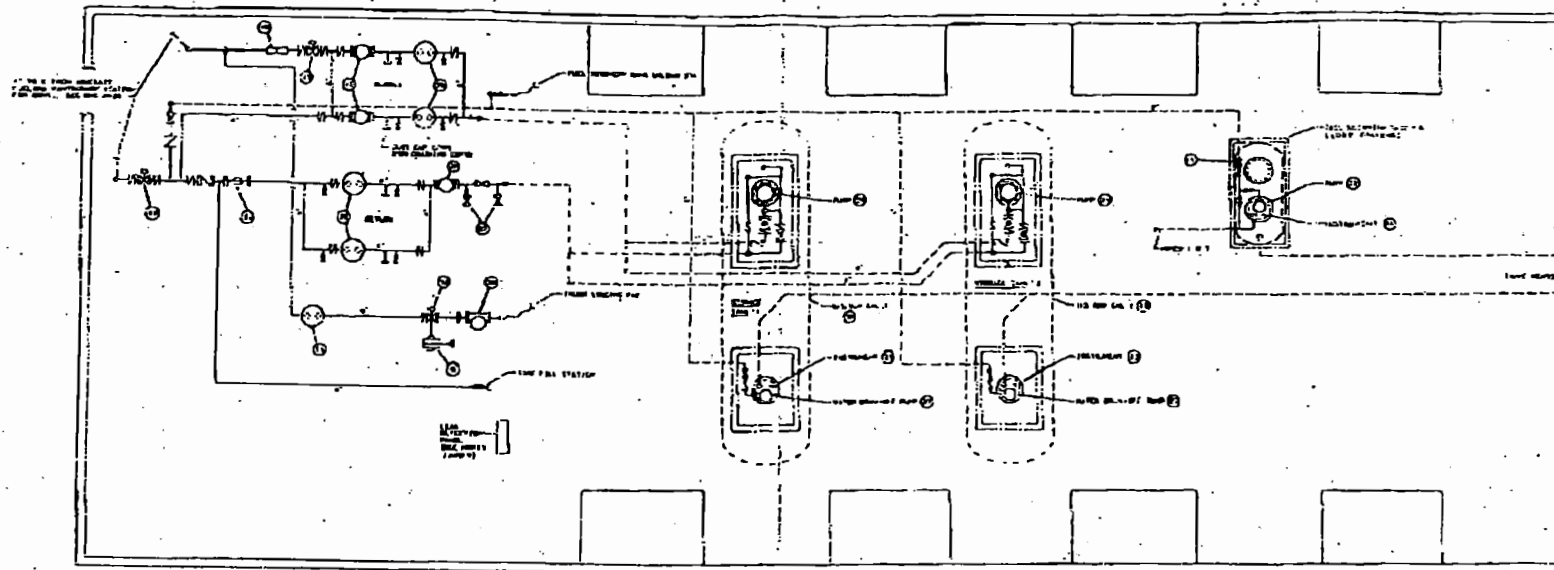
7/25/07



44

FACILITY MAP

NAVAL SUPPORT AREA



LEARNING

- | LEGEND | | |
|---|--|--|
| 22. 3,000 GALLON UNDERGROUND DOUBLE CONTAINMENT FUEL STORAGE TANK | 31. 3" HOSE 18' LONG WITH COUPLINE 31 TYPE NOZZLE. ONE BREAK, CAP AND HOSE PULCH | 47. FLOW TRANSMITTER |
| 23. ONE 104 TWIN HIGH LEVEL ALARM (SET AT 42%), HIGH LEVEL SWITCH (SET AT 42%) AND LOW LEVEL SWITCH (SET IN RELATION TO FUEL OIL DIRECTION INLET) | 32. 20 GPM DEEP WELL TURBINE PUMP (11 FT, 35 FT HEAD) | 48. VENTURI TUBE WITH A PRESSURE TAP |
| 24. 104 SLUG FLOW CONTROL VALVE | 33. FLOW ACTIVATED LINEAR LEVEL INDICATOR AND HIGH LEVEL ALARM | 49. DOUBLE BLOCK AND BUILT PLUG VALVE |
| 25. DIAPHRAGM CONTROL VALVE. TYPICAL | 34. 1,000 GALLON UNDERGROUND DOUBLE CONTAINMENT FUEL DISCOVERY TANK | 50. OPEN SHUT DOWN. TYPICAL |
| 26. CONSERVATION VENT | 35. 1" TALLY COIL USED AND 6" FLOWMETER SPRING LOADED RELIEF VALVE SET AT 50 PSIG. TYPICAL | 51. PRE-EXHAUST TANK |
| 27. 20 GPM STIMULATOR WATER PUMP FOR DEEP WELL TURBINE PUMP (11 FT, 35 FT HEAD) | 36. 1" SAMPLING CONNECTION TAKE-OFF WITH 1/2" BALL VALVE AND FLUSH TYPE OR SCREEN SOURCE DISCONNECT W/OUT CAP | 52. TWO STAGE FLOW CONTROL VALVE ELECTRICALLY CONTROLLED IN SUCH A MANNER THAT THE VALVE CANNOT OPEN IF THE TRUCK CANNOT BE FULL OF THE TANK IS NOT FULLY CHARGED. |
| 28. 300 GPM FILTER/SEPARATOR | 37. COMPRESSOR TYPE DISCONNECT WITH 1/2" BALL VALVE AND DIFFERENTIAL PRESSURE GAUGE TYPICAL. CAPACITY SAME AS FILTER/SEPARATOR | 53. PHASE VARY TYPE SIGHT GLASS |
| 29. 1" MEDIA PROVING CONNECTION 4" BOLD FLANGE | 38. DIAPHRAGM EMERGENCY SHUT-OFF VALVE ACTUATED BY EMERGENCY FLOW SWITCH AT FLOW PAID AND, AT LEAST ONE OTHER LOCATION WITHIN APPROX FUELING AREA | 54. FLOW SWITCH |
| 30. POSITIVE DISPLACEMENT METER MONITORED BY STIMULATOR AIR RELEASE DEVICE AND FLOW CONTROL VALVE | 39. 4" DIAPHRAGM EMERGENCY SHUT-OFF VALVE ACTUATED BY SAME EMERGENCY FLOW SWITCH AS DISCONNECT VALVE ON SUPPLY LINE. VALVE ALSO TO HAVE CHECK VALVE FEATURE WITH MANUAL OVERLOAD FOR ACTION FLOW | 55. 4" WATER PROVING CONNECTION WITH BALL VALVE AND FLUSH TYPE OR SCREEN GUNX |
| 31. 5" BASKET STRAINER | 40. 2 INCH FLOW AND PRESSURE INDICATOR AND RECORDER WITH TRANSDUCER | 56. HIGH PERFORMANCE ORBITAL VALVE (TYPICAL UNLESS OTHERWISE NOTED) |
| 32. 5/8" INCH VALVE. TYPICAL | 41. PRESSURE TRANSMITTER | 57. FLOW SWITCHES FOR CONTROL OF LAG TUFF (2 REQUIRED FOR REDUNDANCY) |
| 33. DEEP WELL TURBINE PUMP 1000 GPM 30 HP 350 FT HEAD | | |
| 34. 4" DIAPHRAGM NON-SLUG CHECK VALVE. TYPICAL | | |

Inventory Control and Tank Tightness Testing

Method of tank tightness testing: _____

Address of tank tightness tester: _____

Please complete all information for each tank

If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				
Overages or shortages are less than 1% + 130 gals of tank's flow-through volume.				
If no, which months were not?				

Please answer yes or no for each question

Owner/operator can explain inventory control methods and figures used and recorded.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Records include monthly water monitoring.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Tank inventory reconciled before and after fuel delivery.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Books are reconciled monthly.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Appropriate calibration chart is used for calculating volume.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Owner can demonstrate consistency in dipsticking techniques.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The dipstick is long enough to reach the bottom of the tank.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The ends of the gauge stick are flat and not worn down.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The tank has been tested within the year & has passed the tightness test (if necessary).	Yes <input type="checkbox"/>	No <input type="checkbox"/>
A third-party certification of the tank tightness test method is available.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Tank tester complied with all certification requirements.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Monitoring and testing are maintained and available for the past 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Comments: **THIS METHOD IS NOT USED AT THIS FACILITY**

Inspector's Signature: _____

J. Shaw

Date: 7/25/07

Vapor Monitoring

Name of monitoring device: _____

Date system installed _____ Number of monitoring wells _____

Distance of monitoring well(s) from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please indicate yes or no for each tank Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.				
Well caps are tight.				
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.				
Well is free of debris or has other indications that it has been recently checked.				

Please answer yes or no for each question

UST excavation zone was assessed prior to vapor monitoring system installation.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
One or more USTs is/are included in system.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

If the system is automatic, check the following:

Power box is accessible and power light is on.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Documentation of monthly readings is available for last 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment used to take readings is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Vapor monitoring equipment has been calibrated within the last year.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

If the system is manual, check the following:

Documentation of monthly readings is available for last 12 months.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment used to take readings is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Vapor monitoring equipment has been calibrated within the last year.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Porous material was used for backfill.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Wells are placed within the excavation zone.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Level of background contamination is known. If so -- what is level?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: **THIS METHOD IS NOT USED AT THIS FACILITY**

Inspector's Signature: _____

Date: 7/25/07

Manual Tank Gauging

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tank 1 & 4): _____

Please answer yes or no for each question

Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Level measurements are based on average of two consecutive stick readings at both beginning and end of period.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
MTG is used as sole method of leak detection for tank.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
MTG is used in conjunction with tank tightness testing.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are all tanks for which MTG is used under 2,000 gallons in capacity?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are monitoring records available for the last 12 month period?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Check One:	Nominal Tank Capacity (in gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
()	110-550	N/A	5	36 hours
()	551 - 1,000*	N/A	7	36 hours
()	1,000*	64" diameter x 73" length	4	44 hours
()	1,000*	48" diameter x 128" length	6	58 hours
()	1,001 - 2,000*	N/A	13	36 hours

* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments: **THIS METHOD IS NOT USED AT THIS FACILITY**

Inspector's Signature: _____

Date: 7/25/07

Ground Water Monitoring

Date System Installed: _____

Distance of well from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Distance of well from piping (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please answer each question of each well

If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.

	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.				
Well was opened and presence of water was observed in well at depth of _____ ft.				

Please answer yes or no for each question

Wells are used to monitor piping.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Site assessment was performed prior to installation of wells.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Documentation of monthly readings is available.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Specific gravity of product is less than one.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Groundwater is not more than 20 feet from ground surface.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Wells are sealed from the ground surface to top of filter pack.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Groundwater is monitored: () Manually on a monthly basis. () Automatically (continuously or monthly basis [Circle one]).		
Check the following if groundwater is monitored <u>manually</u> : Bailer used is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Check the following if groundwater is monitored <u>automatically</u> : Monitoring box is operational.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Checked for presence of sensor in monitoring well.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: THIS METHOD IS NOT USED AT THIS FACILITY

Inspector's Signature: J. Har

Date: 7/25/07

Interstitial Monitoring

Manufacturer and name of system: Incon T1P/4 Tank Sentinel (For Fuel Farm JP-8 Tks 1,2 & 3)

Date system installed: _____

Materials used for secondary barrier: _____

Materials used for internal lining: _____

Interstitial space is monitored (Circle one): automatically, continuously, monthly basis.

Please answer yes or no for each question

All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
System is designed to detect release from any portion of UST system that routinely contains product.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Documentation of monthly readings is available for last 12 months.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
Monitoring box, if present, is operational.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Interstitial space is monitored manually on monthly basis (answer the following question).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Equipment used to take readings is accessible and functional.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Tank is double-walled	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Tank is fitted with internal bladder to achieve secondary containment (answer the following question).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Bladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions).	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier is always above groundwater.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such _____ conditions.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier is constructed from artificially constructed material, with permeability to substance $< 10^6$ cm/sec.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Secondary barrier does not interfere with operation of cathodic protection system.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

Comments: _____

Inspector's Signature:  Date: 7/25/07

Automatic Tank Gauging

Manufacturer, name and model number of system: Incon T1P/4 Tank Sentinel (For Fuel Farm JP-8 Tks 1,2 & 3)

TK 6, the Diesel Emergency Generator UST, is equipped with a separate Incon ATG, observed to be functional during CEI

Please answer yes or no for each question

Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).	Yes <input type="checkbox"/>	No
Device can measure height of product to nearest one-eighth of an inch.	Yes X	No
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	Yes X	No
Documentation is available that the ATG was in test mode a minimum of once a month.	Yes X	No
Checked for presence of gauge in tanks.	Yes X	No
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	Yes X	No
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	Yes X	No
Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.	Yes <input type="checkbox"/>	No
Maintenance records are available upon request.	Yes <input type="checkbox"/>	No
Monthly testing records are available for the past 12 months.	Yes <input type="checkbox"/>	No
Daily monitoring records are available for the past 12 months (if applicable).	Yes X	No

Comments:

Inspector's Signature:

J. J. [Signature]

Date:

7/25/07

Statistical Inventory Reconciliation

Please complete all information for each tank

If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.

Please answer yes or no for each question

Records include monthly water monitoring.

Yes ☐

No ☐

Tank inventory reconciled before and after fuel delivery.

Yes ☐

No ☐

Appropriate calibration chart is used for calculating volume.

Yes ☐

No ☐

Dispenser pumps are calibrated to within 6 cubic inches per five gallons.

Yes ☐

No ☐

The drop tube in the fill pipe extends to within one foot of tank bottom.

Yes ☐

No ☐

Answer one of the following three:

1) Owner can demonstrate consistency in dipsticking techniques.

Yes ☐

No ☐

a) The dipstick is long enough to reach the bottom of the tank.

Yes ☐

No ☐

b) The end of the gauge stick is flat and not worn down.

Yes ☐

No ☐

c) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.

Yes ☐

No ☐

OR

2) Automatic tank gauge is used for readings.

Yes ☐

No ☐

OR

3) Other method is used for readings (explain in comment section below).

Yes ☐

No ☐

A third-party certification of the SIR method is available.

Yes ☐

No ☐

Monitoring and testing records are maintained and available for the past 12 months.

Yes ☐

No ☐

Comments: **THIS METHOD IS NOT USED AT THIS FACILITY**

Inspector's Signature:

J. Haw

Date:

7/25/07

Spill/Overfill Prevention

	Tank 1	Tank 2	Tank 3	Tank 6
Are all tank transfers less than 25 gallons?	Yes No <input checked="" type="checkbox"/> X	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> X	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> X	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> X
Spill Prevention				
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Overfill Prevention				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Butterfly valve (in fill pipe)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Automatic alarm monitoring is used	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Other alarm system	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES FED FAC NO (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.)

Cathodic Protection

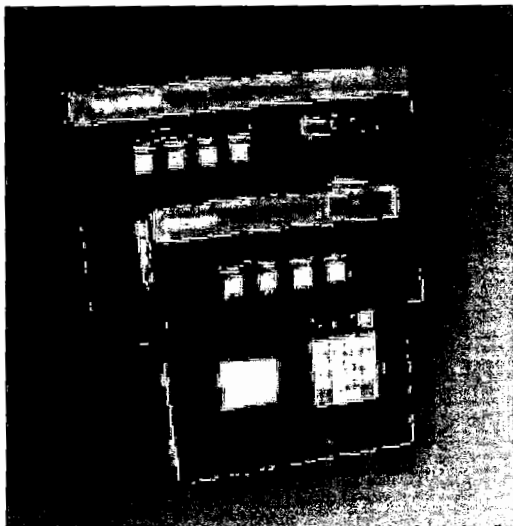
	Tank 1	Tank 2	Tank 3	Tank 4
Sacrificial Anode System				
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
The last two test results are available. (Tests are required every three years.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Impressed Current				
Rectifier is on 24 hours a day?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
The last two test results are available? (Tests are required every 60 days.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

Comments: There were not any parts of the UST systems observed that appeared to require cathodic protection.

Inspector's Signature: 

Date: 7/25/07

ATTACHMENT 2



INCON®

Franklin Fueling Systems

The INCON automatic tank gauging systems provide environmental compliance, inventory, and leak detection information for up to eight underground storage tanks.

Applications

This ATG has been designed to monitor tank tightness, gather inventory information and assist with multiple environmental compliance issues.

- Third-party approved volumetric leak detection (Pd=99.9% at 0.2 gph).
- Provides accurate inventory information, including a "days supply remaining" report which can be used to better-schedule deliveries.
- Can provide dispenser information and automate reconciliation when used in conjunction with the INCON TS-DIM.
- Multi-purpose relays which can be used for outputs to overfill alarms and external audible and visual indicators.

Capabilities

The INCON Automatic Tank Gauges (ATG) have programmable settings and are capable of monitoring up to 8 tanks.

- Offers a wide range of advanced communications options.
- Expanded, backlit LCD display with two lines of forty columns.
- Supports multiple languages.
- Supports English and Metric Units.
- Generates numerous system warnings and tank alarms to quickly notify the user of any potential problem.
- Supports important generator and fuel management features.

Features

- Can monitor up to eight tanks.
- Designed on an openarchitecture platform that is easily expandable for additional capabilities.
- Low cost, compact console handles a wide range of applications.
- Easily programmed through multi-purpose function keys to meet site-specific criteria.
- Generates inventory, compliance, and fuel management reports.
- Internal high-speed fax/data modem capability allows remote access from System Sentinel™.
- Executes automatic system check and notifies user if the unit is not functioning properly.
- Performs continuous leak testing – no station down time required.

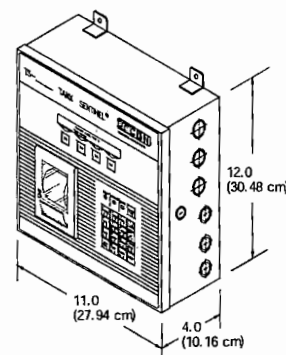
Specifications

Unit Model	TS-1001	TS-1001/G	TS-2001
Dimensions	12"H x 11"W x 4"D	12"H x 11"W x 4"D	12"H x 17"W x 6"D
Input Channels	2(10*)	2(10*)	2(26*)
Output Only Channels	2(10*)	2(10*)	2(26*)
Sensor inputs	12(28*)	12(28*)	24(40*)
Generator Back Up	No	Yes	No
Number of tanks monitored	4	2	8

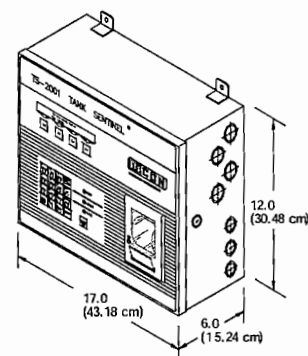
The following specifications apply to all models:

Display type	Alpha-numeric LCD
Applicable liquids	Petroleum, chemicals, and hazardous waste
Level units	Inches or centimeters
Temperature units	Degrees Fahrenheit or Celsius
Volume units	Gallons or Liters
Number of LLDs supported	8
Display size	2 lines of 40 characters
Printer type	24 column thermal
Power requirements	115 VAC +15%, -10%, 100 Watts Maximum, 1 Amp Maximum 230 VAC +15%, -10% (Special Order), 100 Watts Maximum, 0.5 Amp Maximum
Operating Temperature	32° to 122°F (0° to 50°C)
Storage Temperature	-4° to 140°F (-20° to 60°C)
Intrinsic Safety Rating	Class I, Div. 1, Group D

TS-1001/TS-1001/G



TS-2001



* Total number including additional options

Ordering Information

T2P/8 (1-8 tank configuration)
T1P/4 (1-4 Tank configuration)
T1P/2G (1-2 tank configuration with generator back up capability)



000-1367 Rev. D 3/04



Franklin Fueling Systems

3760 Marsh Road
Madison, WI 53718, U.S.A.
Tel: +1 608 838 8786 • Fax: +1 608 838 6433
Tel: USA & Canada 1 800 225 9787
Tel: Mexico 001 800 738 7610
www.franklinfueling.com

INCON®

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